

Remarks/Arguments

Introduction

Applicants have carefully reviewed the Office Action mailed on October 30, 2009. To clarify their invention, applicants have amended claim 19. Claims 19-24 remain pending in this application. No new matter has been added.

Applicants request reconsideration of the above-identified application, as herein amended and in view of the following remarks. Applicants do not concede that the amended claims in their prior form are unpatentable over the art cited by the Examiner. Rather, applicants have made the present claim amendments to facilitate expeditious prosecution of the application. Applicants respectfully reserve the right to pursue these and other claims in one or more continuation and/or divisional patent applications.

Claim Rejections

Claims 19 and 22-24 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,680,939 to Lydon et al. (hereinafter 'Lydon') in view of U.S. Patent No. 6,885,635 to Haq et al. (hereinafter 'Haq'). The applicants respectfully disagree with the rejection.

Claim 19 of the present application recites a router including:

at least X routing components, . . . each of the X routing components having first and second routing engines, each routing engine having M inputs and N outputs where M and N are integers both greater than one;

each first routing engine of each of the X routing components having its inputs coupled by first links in a first fully connected topology to inputs of others of the first routing engines of the X routing components;

each second routing engine of each of the X routing components having its inputs coupled by second links in a second fully connected topology to inputs of others of the second routing engines of the X routing components, wherein said second links are different from said first links;

. . . with each of the first and second routing engines in each routing component serving as a backup to the other of the routing engines in the same routing component.

Thus, claim 19 recites a router that includes two sets of routing engines, where each set is linked in separate, fully connected topologies using different sets of links (see also Applicants' specification, FIG. 1; p. 4, lines 19-30).

While Lydon discloses that routers connected by various links for input signal transmission (see, e.g., Lydon, FIG. 4), Lydon does not disclose the use of redundant, back-up routing engines. In an attempt to cure the deficiencies of Lydon, the examiner relies on Haq, asserting that this patent discloses redundant routing engines and that it would be obvious to connect the redundant routing engines in the same manner as the routers of Lydon. However, Haq merely discloses the use of an active routing engine and a backup routing engine within a single router. Combination of Haq with Lydon would simply result in a router that has two internal routing engines. As noted by the Examiner, the combination would not in any way affect external links between routers or their components (see, Advisory Action of December 8, 2008, p. 4, lines 4-7). Indeed, neither Haq nor Lydon are in any way concerned with providing redundancy of links between router components. Accordingly, because the cited references fail to disclose or render obvious arranging two sets of redundant routing engines in separate, fully connected topologies using different sets of links, claim 19 patentably distinguishes over the references.

Moreover, claims 22-24 are also patentable over Lydon and Haq due at least to their dependencies from claim 19. As such, applicants request withdrawal of the rejection of claims 22-24.

Claims 20 and 21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Lydon in view of Haq in further view of U.S. Publication No. 2002/0159678 (hereinafter 'Derventzis').

Claims 20 and 21 depend from claim 19 and, as such, incorporate by reference two sets of routing engines, where each set is linked in separate, fully connected topologies with different sets of links. As noted above, Lydon and Haq do not disclose or render obvious at least this feature of claim 19. Derventzis concerns an optical switch that routes signals between nodes without performing electrical conversion. However, Derventzis discloses or renders obvious connecting redundant routing engines in separate, fully connected topologies using different sets of links. Thus, Derventzis fails

to cure the deficiencies of Lydon and Haq. Accordingly, claims 20 and 21 are patentable over Lydon, Haq and/or Derventzis for at least the reasons discussed above. As such, applicants request withdrawal of the rejection.

Newly Cited Reference

Applicants have submitted herewith a supplemental Information Disclosure Statement citing two references WO/51290 and WO/086454 which were recently cited to applicants in a supplemental search performed by the European Patent Office. Neither reference, and especially WO/51290 cited as an "X" reference, discloses the features of applicants' claims, especially the feature that the first and second routing engines of each of the X routing components have their inputs coupled to the inputs of the first and second routing engines, respectively by separate topologies.

Conclusion

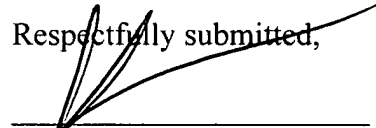
In view of the foregoing, applicants' solicit entry of this Amendment and allowance of the claims. If the Examiner cannot take such action, the Examiner should contact the applicants' attorney at (609) 734-6820 to arrange a mutually convenient date and time for a telephonic interview.

The Office is authorized to charge Deposit Account No. **07-0832** in the amount of **\$810** to cover the **RCE filing fee for a Large Entity**.

It is believed that no additional fees or charges are currently due. However, in the event that any additional fees or charges are required at this time in connection with the application, they may be charged to Deposit Account No. **07-0832**.

Respectfully submitted,

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